REMARKS

Claims 1-22 and 43-45 are in the case.

The present invention relates to a fluidized bed reactor having wall coating formed *in situ* during polymerization of olefin monomer. Prior to the present invention, reactors had to be shut down, cleaned, then coated with the desired material, and then the reactor could be started up and polymerization of a desired polymerization product commenced. This is a huge waste of time and money.

The Idelmann reference (WO 97/49771) is directed to the old-style coatings in the sense of coatings that had to be sprayed onto a reactor wall, necessitating reactor shut down. It is, more specifically, directed to the use of polyethersulfone (PES) polysulphone (PS) and polyetherimide (PEI) coatings. There is no suggestion in Idelmann that PES, PS, or PEI coatings can be formed by *in situ* polymerization.

It cannot be fairly suggested that these PES, PS, or PEI coatings of Idelmann may be coated onto the reactor vessel walls *in situ* during polymerization of olefin monomer. A chemical compound or composition and its properties are inseparable (In re Papesch, 137 USPQQ 43, 41). Idelmann teaches that the coatings are sprayed on. It is Applicant's invention that the coatings may be formed *in situ* - the Examiner is finding inherency or obviousness at one of the exact points of novelty of the present invention. If the PS, PES or PEI coatings in Idelmann cannot be coated onto the reactor *in situ*, then how can they be the same as the coating as taught in the present application? It is pure speculation to suggest that the coatings described by Idelmann in any way anticipate or fairly suggest the present invention. Any such suggestion would rely on alleged inherent characteristics of the coatings described by Idelmann. Inherency must **necessarily** flow from the teachings of the applied prior art (see MPEP §2112), and in the present case there is not the slightest evidence that PES or PEI are capable of being formed *in situ* on a reactor wall during polymerization or that the present invention relates to a wall coating in anyway similar to a coating of PS, PEI, or PES.

Applicant's respectfully assert that the Examiner has not set forth a case of inherent anticipation or a *prima facie* case of obviousness that a fluidized bed reactor

having a wall coating as claimed in the present invention, formed during olefin polymerization, can possibly be the same or obvious from the teachings of a sprayed on coating of PES, PS or PEI as in Idelmann, much less that the reactor wall coating of the reference can possibly contain aluminum and zirconium as called for in the present Claim 45. The present invention has nothing to do with sulfur or nitrogen, much less PES, PS or PEI; Idelmann has nothing to do with fluidized bed polymerization of olefins wherein a reactor wall coating is formed in situ during the polymerization of said olefins (particularly a coating having aluminum and zirconium as in the present Claim 45). Accordingly, how can Idelmann anticipate or fairly suggest the present invention? Again, no rationale has been set forth - because it cannot be rationalized! That the prior art may *possibly* have the same features as the claimed invention will not substantiate a finding of inherency (see In re Oelrich, 212 USPQ 323, 326). How can it be that a coating of PEI, PS or PES is formed *in situ* on a reactor wall during polymerization of olefin monomer as in the present case? It can't be.

Accordingly, it is respectfully requested that the rejection be withdrawn.

It is believed that the present application is in condition for allowance and early notice of the same is earnestly solicited.

Respectfully submitted,

Date: 19 AUGUST 2004

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